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Filed Via ECF

October 1, 2021

Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: U.S. v. Jonathan Rodriguez, et al
S-15 Cr 445 (PAE)**

Dear Judge Engelmayer:

The undersigned has been appointed by the Court to assist in the representation of defendant Jonathan Rodriguez in his pro se application to the Court for Compassionate Release pursuant to 18 U.S.C. § 3582(c). I respectfully move that the Court extend the deadline for filing an amended application for Compassionate Release until October 30, 2021.

On or about May 28, 2021, the Court re-appointed the undersigned to represent Mr. Rodriguez on his application for Compassionate Release and to file a memorandum in support thereof. At the time of the undersigned's re-appointment, the defendant was being held at Gilmer FCI and which is where the undersigned mailed requests to the BOP for the Warden's response to the defendant's administrative request for release and for the defendant's medical and disciplinary records. Authorizations signed by Mr. Rodriguez were provided to the institution. No response was ever received from Gilmer FCI

On or about July 14, 2021, the undersigned was informed that the defendant had been transferred to FTC Oklahoma City, a BOP transfer center. The undersigned immediately forwarded correspondence to the Executive Assistance Warden at Oklahoma City requesting Mr. Rodriguez's disciplinary history, Individual Needs Plan and confirmation of the denial of his request for compassionate release. No records from FTC Oklahoma City were ever provided to the undersigned.

The was thereafter informed that Mr. Rodriguez had been transferred to Butner Medium II FCI, in Butner, North Carolina. The undersigned has requested, yet again, the documents required to complete Mr. Rodriguez's compassionate release application. This request included an email

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to the Executive Assistant at FCI Butner along with a letter to the defendant. The undersigned has also communicated with the family of the defendant to indicate the urgency of the undersigned's request for records. The undersigned has not yet received the requested records from FCI Butner.

The undersigned moves for an extension of time until October 30, 2021, in which to file a supplemental application for Compassionate Release on behalf of Mr. Rodriguez. The undersigned believes that the extension of time will permit the undersigned to receive a response from the Warden of FCI Butner on Mr. Rodriguez's administrative request for compassionate release, will permit the undersigned to receive and review both the disciplinary records and medical records of the defendant and file a memorandum in support of the defendant's application.

The undersigned has discussed the above request with Dina McLeod, Assistant United States Attorney, who indicates that the government has no objection to the extension of time.

I thank the Court for its consideration of the instant application.


Respectfully submitted,

/s/ *Bruce D. Koffsky*
Bruce D. Koffsky

cc: All Counsel of Record

GRANTED. The Clerk of Court is requested to terminate the motion at Dkt. No. 1223.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge